

Morse, Bob

From: Olsen, Marian
Sent: Monday, January 25, 2016 5:28 PM
To: Morse, Bob; Pensak, Mindy; Alvey, Robert
Cc: Metz, Chloe
Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Hi Bob,

As requested, I reviewed the response to comments. Based on this review, I have the following comments which are essentially a request for clarification.

Comment # 1 - Executive Summary

The AF developed a remediation goal that includes dermal contact. I have not been able to locate any AF documents that explain this calculation or the source of toxicity information for dermal exposure. Kindly request the AF to provide the basis for this calculation since the calculated numbers provided in the response are lower than those used by the EPA Superfund Program.

Comment #7. - Development of Risk Assessment

As a point of clarification, the text indicates that a baseline risk assessment may not be needed. It would be helpful to clarify the decision making process to determine the need for a risk assessment.

Comment #8. - Trespasser

If a risk assessment is developed for this area, the trespasser will need to be evaluated in the baseline human health risk assessment. The risk assessment evaluates risks in the absence of institutional controls such as the fence mentioned in the response and remedial action. This is an issue that will need to be addressed in the baseline risk assessment.

Please let me know if you have any questions.

Thanks.

Marian

-----Original Message-----

From: Morse, Bob
Sent: Monday, January 11, 2016 12:52 PM
To: Olsen, Marian <Olsen.Marian@epa.gov>; Pensak, Mindy <Pensak.Mindy@epa.gov>; Alvey, Robert <Alvey.Robert@epa.gov>
Cc: Metz, Chloe <Metz.Chloe@epa.gov>
Subject: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Hi Guys,

Could you take a look and let me know if any major / minor issues please? Thanks. Please remember its just an SI not an RI. Determining presence of contamination more-so than exact nature extent risk fate transport etc.

There will be an RI. Thanks.

Bob

-----Original Message-----

From: FARNSWORTH, DAVID S GS-13 USAF HAF AFCEC/CIBE [mailto:david.farnsworth@us.af.mil]
Sent: Monday, January 11, 2016 9:45 AM
To: Morse, Bob <Morse.Bob@epa.gov>
Cc: Bishop, Heather L (DEC) <heather.bishop@dec.ny.gov>; Baker, Peter S. (peter.baker@amecfw.com) <peter.baker@amecfw.com>; Hagelin, Nathan W. (nathan.hagelin@amecfw.com) <nathan.hagelin@amecfw.com>; Helton, Melissa C (melissa.helton@amecfw.com) <melissa.helton@amecfw.com>
Subject: RE: Draft Perfluorinated Compounds (PFCs) Release Determination At Multiple BRAC Basis – Site Investigation Report (FT-030P) - Former Griffiss Air Force Base

Bob,

Attached are the Air Force responses to the USEPA comments to the Draft Griffiss Fire Training Area PFC SI Report. Request USEPA's feedback on the responses as soon as possible but not later than January 29th, 2016 so that we may finalize the SI report.

Dave

//Signed//

David S. Farnsworth, GS-13, DAF
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-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]
Sent: Friday, November 13, 2015 7:24 PM
To: FARNSWORTH, DAVID S GS-13 USAF HAF AFCEC/CIBE
Cc: Bishop, Heather L (DEC)
Subject: Draft Perfluorinated Compounds (PFCs) Release Determination At Multiple BRAC Basis - Site Investigation Report (FT-030P) - Former Griffiss Air Force Base

Dave,

EPA has reviewed the document titled "Draft Perfluorinated Compounds (PFCs) Release Determination At Multiple BRAC Bases - Site Investigation Report (FT-030P) - Former Griffiss Air Force Base.

EPA comments are attached.

Also attached are recalculated PRG tables, one each for PFOS and PFOA, based on current EPA Region 2 policy / procedures. The recalculations are discussed in the attached EPA comments.

Additional comments related to ecological risk will be forthcoming. We apologize for the delay. If necessary for work to proceed as scheduled by the Air Force, as we have done previously, the ecological risk comments may be incorporated into / used to develop the draft work plan for additional sampling at the site.

Please let me know if you have any questions or concerns. Thank you.

Bob